# United States Bankruptcy Court Middle District of Pennsylvania

In re: Case No. 24-00065-HWV
Erik E Sanchez Chapter 13

Debtor

# **CERTIFICATE OF NOTICE**

District/off: 0314-1 User: AutoDocke Page 1 of 5
Date Rcvd: Mar 25, 2024 Form ID: pdf002 Total Noticed: 93

The following symbols are used throughout this certificate:

Symbol		Definition

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
- ^ Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
- # Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

## Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 27, 2024:

Recip ID		Recipient Name and Address
db	+	Erik E Sanchez, 70 McClellan Lane, Hanover, PA 17331-9327
5588850	+	Adam R. Wilk Esquire, 10615 Judicial Drive #303, Fairfax, VA 22030-7500
5590035	+	Adam Wilk, c/o Rathbone Group, LLC, 1250 Granger Road, Brooklyn Heights, OH 44131-1234
5588851		Advanced Radiology of PA, 26999 Network Place, Chicago, IL 60673-1269
5588855	+	Bureau of Account Management, 3607 Rosemont Avenue, Camp Hill, PA 17011-6904
5588869		CSPROF48, PO Box 1280, Oaks, PA 19456-1280
5588859	+	Chevy Chase Village, PO Box 10579, Rockville, MD 20849-0579
5588862	+	City of Rehoboth Beach, 1 City Hall Drive, PO Box 1163, Rehoboth Beach, DE 19971-0803
5588870	+	Dept of Motor Vehicles, PO Box 37135, Washington, DC 20013-7135
5588873		Emergency Medical Assoc - CHC, 29919 Century Blvd, Suite 200, Germantown, MD 20874-1118
5588875	+	Franklin & Prokopik PC, 2 N Charles Street, Ste 600, Baltimore, MD 21201-3723
5588884	+	Jesse Sanchez, 70 McClellan Lane, Hanover, PA 17331-9327
5588886	+	LDC Collection Systems, PO Box 10579, Rockville, MD 20849-0579
5588887	+	Levid Valles, 5621 Landover Road, Hyattsville, MD 20784-1228
5588888	+	Linebarger Goggan Blair &, Sampson, LLC, 1600 John F Kennedy Blvd, Philadelphia, PA 19103-2852
5588891	#+	McKenzie Capital, 3390 Mary Street, Suite 216, Miami, FL 33133-5258
5588899	+	Pinnacle Health, PO Box 826813, Philadelphia, PA 19182-6813
5588903	+	Progressive Select Insurance Co, 5920 Landerbrook Drive, Cleveland, OH 44124-6506
5590036	+	Progressive Select Insurance Company, c/o Rathbone Group, LLC, 1250 Granger Road, Brooklyn Heights, OH 44131-1234
5588905	+	Quantum Imaging & Therapeutic, Dept 19687, Post Office Box 1259, Oaks, PA 19456-1259
5588907	#+	Receivables Performance Mgmt, Attn: Bankruptcy, Po Box 1548, Lynnwood, WA 98046-1548
5588912	+	Soon Park, 5621 Landover Road, Hyattsville, MD 20784-1228
5588914	+	State Farm Life Insurance Company, PO Box 2364, Bloomington, IL 61702-2364
5589519		U.S. Department of Housing and Urban Development, 12th Floor 801 Market Street, Philadelphia, PA 19107
5588920		UPMC Pinnacle, 300 Highland Avenue, Hanover, PA 17331-2297
5588922	+	Washington DC CCU, 1101 4th Street, 2nd Floor, Washington, DC 20024-4457

TOTAL: 26

## Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

<b>Recip ID</b> 5588849	٨	Notice Type: Email Address MEBN	Date/Time	Recipient Name and Address
33000+7		NIEDIY	Mar 25 2024 18:44:59	Account Resolution Services, Attn: Bankruptcy, Po Box 459079, Sunrise, FL 33345-9079
5588852	۸	MEBN	Mar 25 2024 18:44:03	Affiliate Asset Solutions LLC, 145 Technology Pkwy NW, Ste 100, Norcross, GA 30092-3536
5588853		Email/Text: EBNProcessing@afni.com	Mar 25 2024 18:50:00	Afni, 1310 Martin Luther King Drive, Post Office Box 3068, Bloomington, IL 61702-3068
5588854	٨	MEBN	Mar 25 2024 18:45:08	Arcadia, Post Office box 6768, Reading, PA 19610-0768
5588856	+	Email/Text: Bankruptcy@BAMcollections.com	Mar 25 2024 18:49:00	Bureau of Account Managment, 3607 Rosemont

District/off: 0314-1 User: AutoDocke Page 2 of 5
Date Rcvd: Mar 25, 2024 Form ID: pdf002 Total Noticed: 93

				Ave Ste 502, Po Box 8875, Camp Hill, PA 17001-8875
5588857	+	Email/Text: payments@brsi.net	Mar 25 2024 18:50:00	Business Revenue Systems Inc, 2102 S Main Street, Burlington, IA 52601-6528
5588868		Email/Text: correspondence@credit-control.com	Mar 25 2024 18:49:00	Credit Control, LLC, 8001 Woodland Center Boulevard, Suite 200, Tampa, FL 33614
5588867		Email/Text: correspondence@credit-control.com	Mar 25 2024 18:49:00	Credit Control, LLC, PO Box 546, Hazelwood, MO 63042
5588858	+	Email/Text: bmg.bankruptcy@centurylink.com	Mar 25 2024 18:50:00	CenturyLink, PO Box 1319, Charlotte, NC 28201-1319
5588860	+	Email/Text: jozlin_johnson@staffdefense.com	Mar 25 2024 18:49:00	Cincinnati Insurance Co, PO Box 145496, Cincinnati, OH 45250-5496
5588861	+	Email/PDF: Citi.BNC.Correspondence@citi.com	Mar 25 2024 18:59:52	Citibank/Best Buy, Citicorp Credit Srvs/Centr Bk dept, Po Box 790034, St Louis, MO 63179-0034
5588863	+	$Email/Text: Collections\_Bankruptcies@encoreexchange.com$	n Mar 25 2024 18:49:00	Computer Credit, Inc., PO Box 5238, Winston
5588864	+	Email/Text: convergent@ebn.phinsolutions.com		Salem, NC 27113-5238
			Mar 25 2024 18:50:00	Convergent Outsourcing Inc, 800 SW 39th St, Post Office Box 9004, Renton, WA 98057-9004
5588865		Email/Text: convergent@ebn.phinsolutions.com	Mar 25 2024 18:50:00	Convergent Outsourcing, Inc., Attn: Bankruptcy, 800 Sw 39th St, Ste 100, Renton, WA 98057-4927
5588866	+	Email/Text: ebnnotifications@creditacceptance.com	Mar 25 2024 18:49:00	Credit Acceptance, Attn: Bankruptcy, 25505 West 12 Mile Road Ste 3000, Southfield, MI 48034-8331
5588871		Email/Text: mrdiscen@discover.com	Mar 25 2024 18:49:00	Discover Bank, PO Box 15316, Wilmington, DE 19850
5590444		Email/Text: mrdiscen@discover.com	Mar 25 2024 18:49:00	Discover Bank, Discover Products Inc, PO Box 3025, New Albany, OH 43054-3025
5588872	۸	MEBN	Mar 25 2024 18:44:09	Dynamic Recovery Solutions, 135 Interstate Boulevard, Greenville, SC 29615-5720
5588874		Email/Text: mary@firstcollect.net	Mar 25 2024 18:49:00	First Collect, Inc, PO Box 102, Lewes, DE 19958
5588876		Email/Text: reports@halstedfinancial.com	Mar 25 2024 18:49:00	Halsted Financial Services, PO Box 828, Skokie, IL 60076
5588881	۸	MEBN	Mar 25 2024 18:44:20	HRRG, PO Box 8486, Pompano Beach, FL 33075-8486
5588877	+	Email/Text: lyonsbe2@upmc.edu	Mar 25 2024 18:49:00	Hanover Hospital/UPMC, 300 Highland Avenue, Hanover, PA 17331-2203
5588878		Email/Text: Harris@ebn.phinsolutions.com	Mar 25 2024 18:50:00	Harris & Harris Ltd, 111 W Jackson Blvd, Ste 400, Chicago, IL 60604-4135
5588879	٨	MEBN	Mar 25 2024 18:44:55	Hayt, Hayt & Landau LLC, Meridian Center 1, 2 Industiral Way West, Eatontown, NJ 07724-2279
5588880	۸	MEBN	Mar 25 2024 18:44:38	Hayt, Hayt & Landau LLC, Post Office Box 500, Eatontown, NJ 07724-0500
5588847		Email/Text: sbse.cio.bnc.mail@irs.gov	Mar 25 2024 18:49:00	Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101-7346
5588882	+	Email/PDF: ais.sync.ebn@aisinfo.com	Mar 25 2024 18:59:52	JCPenney/GECRB, PO Box 965005, Orlando, FL 32896-5005
5588883		Email/Text: JCAP_BNC_Notices@jcap.com	Mar 25 2024 18:50:00	Jefferson Capital Systems, 16 Mcleland Rd, Saint Cloud, MN 56303
5597787		Email/Text: JCAP_BNC_Notices@jcap.com	Mar 25 2024 18:50:00	Jefferson Capital Systems, LLC, PO Box 7999, St. Cloud, MN 56302-9617
5588885	+	Email/Text: PBNCNotifications@peritusservices.com		

District/off: 0314-1 User: AutoDocke Page 3 of 5 Total Noticed: 93 Date Rcvd: Mar 25, 2024 Form ID: pdf002 Mar 25 2024 18:49:00 Kohls/Capital One, Attn: Credit Administrator, Po Box 3043, Milwaukee, WI 53201-3043 5596419 Email/PDF: resurgentbknotifications@resurgent.com Mar 25 2024 18:49:21 LVNV Funding, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587 5588889 Email/Text: amps@manleydeas.com Mar 25 2024 18:49:00 MANLEY DEAS KOCHALSKI LLC, Post Office Box 165028, Columbus, OH 43216-5028 5588890 + Email/Text: bknotices@mbandw.com Mar 25 2024 18:49:00 McCarthey Burgess Wolff, 26000 Cannon road, Bedford, OH 44146-1807 5602340 Email/Text: SSTBKNotices@nationalbankruptcy.com Mar 25 2024 18:49:00 Medallion Bank, c/o Systems & Services, Technologies, Inc., PO Box 9013, Addison, Texas 75001-9013 5596766 Email/PDF: ais.midfirst.ebn@aisinfo.com Mar 25 2024 18:59:40 MidFirst Bank, 999 NorthWest Grand Boulevard. Oklahoma City, OK 73118-6051 5588892 Email/Text: bankruptcydpt@mcmcg.com Midland Credit Management, 8875 Aero Drive, Mar 25 2024 18:50:00 Suite 200, San Diego, CA 92123-2255 5598186 + Email/Text: bankruptcydpt@mcmcg.com Mar 25 2024 18:50:00 Midland Credit Management, Inc., PO Box 2037, Warren, MI 48090-2037 5588893 Email/Text: bankruptcydpt@mcmcg.com Mar 25 2024 18:50:00 Midland Fund, Attn: Bankruptcy, 350 Camino De La Reine, Suite 100, San Diego, CA 92108-3007 5588894 + Email/PDF: ais.midfirst.ebn@aisinfo.com Mar 25 2024 18:59:53 Midland Mortgage Co/Midfirst, Attn: Customer Service/Bankruptcy, Po Box 26648, Oklahoma City, OK 73126-0648 5588895 ^ MEBN Mar 25 2024 18:43:59 National Enterprise Systems, 2479 Edison Blvd Unit A, Twinsburg, OH 44087-2476 5588896 Email/Text: RVSVCBICNOTICE1@state.pa.us Mar 25 2024 18:50:00 PA Department of Revenue, Attn: Bankruptcy Division, PO Box 280946, Harrisburg, PA 17128-0946 5588848 Email/Text: RVSVCBICNOTICE1@state.pa.us Mar 25 2024 18:50:00 PA Dept of Revenue, Attn: Bankruptcy Division, Dept 280946, Harrisburg, PA 17128-0946 5588897 Email/Text: bankruptcies@penncredit.com Mar 25 2024 18:49:00 Penn Credit, 2800 Commerce Drive, Harrisburg, PA 17110 5588898 Email/Text: info@phoenixfinancialsvcs.com Mar 25 2024 18:49:00 Phoenix Financial Services, 8902 Otis Avenue, Ste 103A, Indianapolis, IN 46216-1077 Email/Text: Bankruptcy.Notices@pnc.com 5588900 Pnc Bank, Attn: Bankruptcy, 2730 Liberty Ave, Mar 25 2024 18:49:00 Pittsburgh, PA 15222 5590795 Email/Text: RVSVCBICNOTICE1@state.pa.us Mar 25 2024 18:50:00 Pennsylvania Department of Revenue, Bankruptcy Division PO Box 280946, Harrisburg, PA 17128-0946 5588902 Email/Text: bankruptcy\_notifications@ccsusa.com Mar 25 2024 18:50:00 Progressive Advanced Insurance, c/o CCS, 725 Canton Street, Norwood, MA 02062-2609 5588904 + Email/Text: clientrelations@optiosolutions.com Mar 25 2024 18:49:00 Qualia Collection Sevices, 1444 North McDowell Boulevard, Petaluma, CA 94954-6515 5588906 Email/Text: ngisupport@radiusgs.com Mar 25 2024 18:49:00 Radius Global Solutions LLC, PO Box390905, Minneapolis, MN 55439-0905 5588908 Email/Text: admin@rsgcollect.com Mar 25 2024 18:49:00 Recovery Solutions, 1008 Mattlind Way, Milford, DE 19963-5300 5588916 Email/Text: ccubankruptcy.notices@maryland.gov Mar 25 2024 18:49:00 State of MD Central Collection Unit, Fifth Floor Certifications, 300 West Preston Street, Baltimore, MD 21201

Mar 25 2024 18:50:00

Mar 25 2024 18:50:00

Santander Consumer USA, Attn: Bankruptcy, Po Box 961245, Fort Worth, TX 76161-0244

Santander Consumer USA, Inc., d/b/a Chrysler Capital, P.O. Box 961275, Fort Worth, TX

Email/Text: enotifications@santanderconsumerusa.com

+ Email/Text: enotifications@santanderconsumerusa.com

5588909

5592719

District/off: 0314-1 User: AutoDocke Page 4 of 5
Date Rcvd: Mar 25, 2024 Form ID: pdf002 Total Noticed: 93

			76161-0275
5588910	+ Email/PDF: OGCRegionIIIBankruptcy@hud.gov	Mar 25 2024 18:49:20	Secretary of Housing & Urban Develo, 451 Seventh Street SW, Washington, DC 20410-0001
5588911	+ Email/PDF: OGCRegionIIIBankruptcy@hud.gov	Mar 25 2024 18:49:20	Secretary of Housing and Urban Deve, 451 7th Street SW, Washington, DC 20410-0001
5588913	+ Email/Text: bknotices@mbandw.com	Mar 25 2024 18:49:00	Sprint Solutions, c/o McCarthy Burgess & Wolff, 26000 Cannon Road, Bedford, OH 44146-1807
5588915	^ MEBN	Mar 25 2024 18:45:30	State of Delaware DOT, PO Box 697, Dover, DE 19903-0697
5588917	+ Email/PDF: ais.sync.ebn@aisinfo.com	Mar 25 2024 18:49:08	Synchrony Bank, PO Box 960013, Orlando, FL
5588918	+ Email/Text: bankruptcysst@alorica.com	Mar 25 2024 18:49:00	32896-0013  Systems & Services Tech, Inc., Attn: Bankruptcy,
5588919	+ Email/Text: bankruptcy@bbandt.com	Mar 25 2024 18:49:00	4315 Pickett Road, Saint Joseph, MO 64503-1600  Truist Bank, PO Box 1847, Wilson, NC
5590439	+ Email/Text: bankruptcy@bbandt.com	Mar 25 2024 18:49:00	27894-1847  Truist Bank, Attn: Support Services, PO Box
5588921	+ Email/Text: wfmelectronicbankruptcynotifications@verizonv	wireless.com Mar 25 2024 18:49:00	85092, Richmond, VA 23285-5092  Verizon Wireless, Attn: Bankruptcy, 500 Technology Dr, Ste 599, Weldon Springs, MO
5588924	Email/Text: bankomail@wilbergroup.com	N. 25 2024 10 40 00	63304-2225
5588923	+ Email/Text: lconey@whiterosecu.com	Mar 25 2024 18:49:00	Wilber & Assoc PC, 210 Landmark Drive, Normal, IL 61761-2194
5590890	+ Email/Text: lconey@whiterosecu.com	Mar 25 2024 18:50:00	White Rose Credit Unio, 1529 Rodney Road, York, PA 17408-9716
		Mar 25 2024 18:50:00	White Rose Credit Union, 3498 Industrial Drive, York, PA 17402-9050
5588925	+ Email/Text: ebn@wfcorp.com	Mar 25 2024 18:50:00	Williams & Fudge, PO Box 11590, Rock Hill, SC 29731-1590
5588926	+ Email/Text: kcm@yatb.com	Mar 25 2024 18:49:00	York Adams Tax Bureau, Post Office Box 15627, York, PA 17405-0156

TOTAL: 67

## **BYPASSED RECIPIENTS**

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip IDBypass ReasonName and Address5588901Proffessional Account Mgmt, Removed per entry 13

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 27, 2024 Signature: /s/Gustava Winters

District/off: 0314-1 User: AutoDocke Page 5 of 5 Date Rcvd: Mar 25, 2024 Form ID: pdf002 Total Noticed: 93

# CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 25, 2024 at the address(es) listed

Name **Email Address** 

Denise E. Carlon

on behalf of Creditor MIDFIRST BANK bkgroup@kmllawgroup.com bkgroup@kmllawgroup.com

Gary J Imblum

on behalf of Debtor 1 Erik E Sanchez gary.imblum@imblumlaw.com

gary.imblum@ecf.inforuptcy.com;carol.shay@ecf.inforuptcy.com;sharlene.miller@ecf.inforuptcy.com;bernadette.davis@ecf.inforuptcy.com;gary.j.imblum@ecf.inforuptcy.com;imblumgr82281@notify.bestcase.com

Jack N Zaharopoulos

TWecf@pamd13trustee.com

United States Trustee

ustpregion03.ha.ecf@usdoj.gov

TOTAL: 4

Rev. 12/01/19

## **LOCAL BANKRUPTCY FORM 3015-1**

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:			CHAPTER 13		
Erik E Sanchez	z		CASE NO. 1-2.	3-	
		-  -	Number of Moti Number of Moti 13 PLAN	AN PLAN (Indicate 1st, ons to Avoid Liens ( ons to Value Collate	(2)
Debtors must ch "Not Included"	eck one box on ea or if both boxes a	ach line to state whether or not the re checked or if neither box is chec	olan includes each	of the following iten will be ineffective if	ns. If an item is checked as set out later in the plan.
in the stand		rd provisions, set out in § 9, which wed by the U.S. Bankruptcy Court		✓ Included	☐ Not Included
2 The plan co	ontains a limit on	the amount of a secured claim, set payment or no payment at all to th	out in § 2.E, [ e secured	Included	✓ Not Included
3 The plan av	voids a judicial lie t out in § 2.G.	en or nonpossessory, nonpurchase-	noney security [	✓ Included	☐ Not Included
be confirmed an stated on the No	d become binding tice issued in con	YOUR RIGHTS WII Y. If you oppose any provision of t g on you without further notice or h nection with the filing of the plan.  LENGTH OF PLAN.	his plan, you must	file a timely written	objection. This plan may dibefore the deadline
<b>A.</b>		From Future Income			
1. To date, the Debtor paid \$ 0.00 (enter \$0 if no payments have been made to the Trustee to date). Debtor shall pay to the Trustee for the remaining term of the plan the following payments. If applicable, in addition to monthly plan payments, Debtor shall make conduit payments through the Trustee as set forth below. The total base plan is \$ 154,000.00 , plus other payments and property stated in § 1B below:					
Start	End	Plan	Estimated	Total	Total
mm/yy	mm/yy	Payment	Conduit Payment	Monthly Payment	Payment Over Plan Tier
02/2024	08/2028	\$2800.			\$154,000.00
09/2028	01/2029	\$0.	00 \$0.0	0 \$0.00	\$0.00
I	1		1	1	<b> </b>

2. If the plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payments and the plan funding. Debtor must pay all post-petition mortgage payments that come due before the initiation of conduit mortgage payments.

Total Payments:

Software Copyright (c) 1996-2022 Best Case, LLC - www.bestcase.com

Best Case Bankruptcy

\$154,000.00

Rev. 12/01/19

	3. Debtor	shall ensure that any wage attachments are adjuste	ed when necessary to conform to the terms of the plan.
	4. CHECK	K ONE: Debtor is at or under median income. In completed or reproduced.	f this line is checked, the rest of § 1.A.4 need not be
		Debtor is over median income. Debtor to allowed unsecured creditors in order to	estimates that a minimum of \$147,720.00 must be paid comply with the Means Test.
1	B. <u>Addition</u> a	al Plan Funding From Liquidation of Assets/Ot	<u>her</u>
	value o		tate is \$\)\( \begin{aligned}             0.00 \\
	Check one	e of the following two lines.	
	✓ No asset	ets will be liquidated. If this line is checked, the re	st of § 1.B.2 and complete § 1.B.3 if applicable
	☐ Certain	assets will be liquidated as follows:	
	amoun		shall dedicate to the plan proceeds in the estimated gnated as All sales shall be completed by If the position of the property shall be as follows:
	3. Other pa	ayments from any source(s) (describe specifically	) shall be paid to the Trustee as follows:
2. 8	SECURED CLAI	MS.	
A	A. Pre-Confi	irmation Distributions. Check one.	
5	✓ None. If "None"	is checked, the rest of § 2.A need not be complete	ed or reproduced.
		s (Including Claims Secured by Debtor's Princ	ipal Residence) and Other Direct Payments by
_			.1
	•	" is checked, the rest of $\S$ 2.B need not be complete	
٥	modification o	e made by the Debtor directly to the creditor according those terms unless otherwise agreed to by the cord in full under the plan.	
Naı	me of Creditor	Description of Collateral	Last Four Digits of Account Number
	cceptance	2021 Toyota Camry	9336
	Mortgage Co	70 McClellan Lane Hanover, PA 17331	3668
Secretary of Housing and Urban Dev. (no payment until sold)		70 McClellan Lane, Hanover, Pa 17331	
C.	Arrears (Inclu	uding, but not limited to, claims secured by Deb	otor's principal residence). Check one.
	None. If "None"	' is checked, the rest of $\S$ 2.C need not be complete	ed or reproduced.
5	arrears are not	itemized in an allowed claim, they shall be paid in	nount of arrearages in the allowed claim. If post-petition in the amount stated below. Unless otherwise ordered, if it in this section, all payments to the creditor as to that
		2	
Software Copy	yright (c) 1996-2022 Best	Case, LLC - www.bestcase.com	Best Case Bankruptcy

collateral shall cease, and the claim will no longer be provided for under § 1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre-petition Arrears to be Cured	Estimated Post-petition Arrears to be Cured	Estimated Total to be paid in plan
Midland Mortgage Co	70 McClellan Lane, Hanover PA 17331	\$0.00 As per POC		\$0.00 As per POC
Credit Acceptance	2021 Toyota Camry	6182.91 As per POC	\$0.00	\$6182.91 As per POC

D. C	Other secured claims	conduit payments and claims for which a	§ 506 valuation is not applicable, etc.)
------	----------------------	---	--

**✓** None. If "None" is checked, the rest of § 2.D need not be completed or reproduced.

E. Secured claims for which a § 5	506 valuation is applicable. Check one
-----------------------------------	--

**☑** None. If "None" is checked, the rest of § 2.E need not be completed or reproduced.

□ Claims listed in the subsection are debts secured by property not described in § 2.D of this plan. These claims will be paid in the plan according to modified terms, and liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under §1328 of the Code. The excess of the creditor's claim will be treated as an unsecured claim. Any claim listed as "\$0.00" or "NO VALUE" in the "Modified Principal Balance" column below will be treated as an unsecured claim. The liens will be avoided or limited through the plan or Debtor will file an adversary or other action (select method in last column). To the extent not already determined, the amount, extent or validity of the allowed secured claim for each claim listed below will be determined by the court at the confirmation hearing. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Value of Collateral (Modified Principal)	Interest Rate	Total Payment	Plan, Adversary or Other Action
None					

## F. Surrender of Collateral. Check one.

 $\square$  None. If "None" is checked, the rest of § 2.F need not be completed or reproduced.

☑ The Debtor elects to surrender to each creditor listed below the collateral that secures the creditor's claim. The Debtor requests that upon confirmation of this plan or upon approval of any modified plan the stay under 11 U.S.C. §362(a) be terminated as to the collateral only and that the stay under §1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 4 below.

Name of Creditor	Description of Collateral to be Surrendered
Systems & Services Tech, Inc.	Recreational Vehicle

**G.** <u>Lien Avoidance</u>. Do not use for mortgages or for statutory liens, such as tax liens. Check one.

□ None. If "None" is checked, the rest of § 2.G need not be completed or reproduced.

The Debtor moves to avoid the following judicial and/or nonpossessory, non-purchase money liens of the following creditors pursuant to § 522(f) (this § should not be used for statutory or consensual liens such as mortgages).

Name of Lien Holder	Midland Credit Mgmt, Inc.
Lien Description	Entered 11/18/2022
For judicial lien, include court and docket number	Judgment Lien
Description of the liened property	70 McClellan Lane Hanover, PA 17331 York County
Liened Asset Value	\$170,000.00
Sum of Senior Liens	\$211,406.47
Exemption Claimed	\$0.00
Amount of Lien	\$1,929.65
Amount Avoided	\$1,929.65

Name of Lien Holder	Midland Credit Mgmt. Inc
Lien Description	Entered 3/05/2023
For judicial lien, include court and docket number	Judgment Lien
Description of the liened property	70 McClellan Lane Hanover, PA 17331 York County
Liened Asset Value	\$170,000.00
Sum of Senior Liens	\$211,406.47
Exemption Claimed	\$0.00
Amount of Lien	\$2,559.09
Amount Avoided	\$2,559.09

#### 3. PRIORITY CLAIMS.

## A. Administrative Claims

- 1. Trustee's Fees. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.
- 2. Attorney's fees. Complete only one of the following options:
  - a. In addition to the retainer of \$\( \bigcup\_{\text{0.00}} \) already paid by the Debtor, the amount of \$\( \bigcup\_{\text{0.00}} \) in the plan. This represents the unpaid balance of the presumptively reasonable fee specified in L.B.R. 2016-2(c); or
  - b. \$\sec 9, Below per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between the Debtor and the attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to L.B.R. 2016-2(b).
- 3. Other. Other administrative claims not included in §§ 3.A.1 or 3.A.2 above. Check one of the following two lines.
- **✓** None. If "None" is checked, the rest of  $\S$  3.A.3 need not be completed or reproduced.

## B. Priority Claims (including, certain Domestic Support Obligations)

Allowed unsecured claims, entitled to priority under § 1322(a) will be paid in full unless modified under § 9.

Name of Creditor	Estimated Total Payment	
Internal Revenue Service	\$0.00- As per POC	
PA Department of Revenue	\$0.00 - As per POC	
York Adams Tax Bureau	\$0.00 As per POC	

4

Rev. 12/01/19

	Support Obligations assigned t following two lines.	o or owed to a go	vernmental u	nit under 11 U.S	S.C. §507(a)(1)	( <b>B</b> ). Check
✓ None. If "N	one" is checked, the rest of § 3.C	need not be comp	oleted or repro	duced.		
4. UNSECURED	CLAIMS					
	Unsecured Nonpriority Creditor of the following two lines.	ors Specially Clas	sified.			
▼ None. If "No	one" is checked, the rest of § 4.A	need not be comp	leted or repro	duced.		
B. Remaining other class	g allowed unsecured claims wil	l receive a pro-ra	ta distributio	n of funds rema	ining after pay	ment of
· · · · · · · · · · · · · · · · · · ·	— ' CONTRACTS AND UNEXPI	IRED LEASES. (	Check one of th	he following two	lines.	
□ None If "N	one" is checked, the rest of § 5 n	and not he comple	ted or reprodu	cad		
	ng contracts and leases are assum	•	•		n the plan) or re	ejected:
Name of Other Party	Description of Contract or Lease	Monthly Payment	Interest Rate	Estimated Arrears	Total Plan Payment	Assume or Reject
Gitts Run Mini Storage	Lease of Storage Unit; \$95.40/mo.; Current (contains miscellaneous household goods, worth approximately \$400.00)	\$109.00	0%	\$0.00	\$0.00	Assume
Property of the  Check the apple  plan confi entry of di closing of	rmation. ischarge.	upon				
. DISCHARGE	: (Check one)					
	will seek a discharge pursuant to s not eligible for a discharge beca		s previously re	ceived a discharg	ge described in	§ 132 <b>8(f)</b> .
. ORDER OF D	ISTRIBUTION:					
a pre-petition creditor a pre-petition creditor llowed, subject to object	files a secured, priority or special ction by the Debtor.	illy classified clair	n after the bar	date, the Trustee	will treat the cl	laim as
ayments from the plan	will be made by the Trustee in th	e following order:				
evel 1:evel 2:evel 3:evel 4:						
-	Best Case, LLC - www.bestcase.com	5			Bes	st Case Bankruptcy

Rev	12/	N 1 /	/19

Level 5: Level 6: Level 7:	
Level 8:	
	Levels are filled in, the rest of § 8 need not be completed or reproduced. If the above Levels are not filled-in, then the tribution of plan payments will be determined by the Trustee using the following as a guide:
Level 1:	Adequate protection payments.
Level 2:	Debtor's attorney's fees.
Level 3:	Domestic Support Obligations.
Level 4:	Priority claims, pro rata.
Level 5:	Secured claims, pro rata.
Level 6:	Specially classified unsecured claims.
Level 7:	Timely filed general unsecured claims.
Level 8:	Untimely filed general unsecured claims to which the Debtor has not objected.

## 9. NONSTANDARD PLAN PROVISIONS

Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the plan is void. (NOTE: The plan and any attachment must be filed as one document, not as a plan and exhibit.)

#### **ADDENDUM TO CHAPTER 13 PLAN**

- 1A. If one of the Debtors is not employed at the time of the filing of the Plan, but has the ability to work, Debtors will notify counsel when he (or she) returns to work, and any necessary adjustments to the Plan will be made at that time.
- 2(C) & 2(D). Said amounts are estimated. Debtor will pay the amount as stated in the Proof of Claim unless an objection is filed to the claim, in which case debtor will pay the amount determined by the Court or as agreed to by the parties. Debtor waives the right to object to these claims after the Plan is confirmed.
- 2(E). Amounts stated are estimated. If an objection is filed to a Proof of Claim, payment of the amount determined by the Court or as stipulated to by the parties.
- 2F. The collateral being surrendered is being surrendered in full satisfaction of debt.
- 3B. IRS, PA Department of Revenue and local tax claims The priority and/or secured portion of a timely filed allowed Proof of Claim relating to tax claims referenced shall be paid in full through the Plan. If an objection is filed to any such claim, the amount of the unsecured priority and secured claim determined by the Court or through agreement of the parties shall be paid in full through the Plan.

Debtor may in the future provide for payment of post petition federal, state and/or local tax claims to the detriment of non priority unsecured claims.

3A(2). Attorney fees. Debtor's counsel will bill attorney's time at \$295.00 per hour associates time at \$235.00 per hour and paralegal time at \$135.00 per hour, through December 31, 2023. Effective January 1, 2024, rates increased to \$345.00per hour for attorney, \$285.00 per hour for associate time and \$175.00 per hour for paralegal time. Said hourly fees are subject to change upon reasonable notice to Debtor(s). Debtor's counsel will submit a Fee Application to the Court for approval of fees. Only those fees and costs approved by the Court shall be paid by the Trustee to counsel.

In addition to fees, Debtors will be responsible for expenses, including photo copying, travel (where applicable), postage, court costs, filing fees, and similar expenses which are incurred by counsel in the course of performing services to the Debtors.

6

Dated: 12-28-23

Gary J. Imblum
Attorney for Debtor

Erik E Sanchez
Debtor

By filing this document, the debtor, if not represented by an attorney, or the Attorney for Debtor also certifies that this plan contains no nonstandard provisions other than those set out in § 9.

7

Software Copyright (c) 1996-2022 Best Case, LLC - www.bestcase.com

Best Case Bankruptcy